Ms. Trish Kelly, Director of Reimbursement Integrated Health Services, Inc. The Highlands 910 Ridgebrook Road Sparks, Maryland 21152

Re: AC# 3-MRH-J7 – Magnolia Manor - Rock Hill, Inc.

Dear Ms. Kelly:

The accompanying report has been prepared by our office based on your Medicaid Financial and Statistical Report submitted to the Department of Health and Human Services for the cost report period October 1, 1996 through September 30, 1997. That report was used to set the rate covering the contract periods beginning October 1, 1998.

We are recommending that the Department of Health and Human Services certify an accounts receivable to recover amounts due as a result of the rate changes shown on Exhibit A. You will be notified of repayment terms by that agency.

By request of the state medicaid agency this letter also serves as an official notice of your requirement to respond with a report of planned corrective actions on the recommendations and deficiencies noted in this report within forty-five (45) days of the date of this letter. Your response should reference the audit control number and be addressed to: Division of Home Health and Nursing Facility Services, Department of Health and Human Services, Post Office Box 8206, Columbia, South Carolina, 29202-8206. You are also required to simultaneously furnish a copy of your corrective action report to the State Auditor's Office.

If you take exception to this report in any manner, you have the right to appeal in accordance with the <u>Code of Laws of South Carolina, 1976</u> as amended, Title 44, and Department of Health and Human Services Regulation R.126-150, and you must respond in writing within thirty (30) calendar days of the date of this letter. This written response must address the specific items in the report being appealed, and must be directed to the Appeals and Hearings, Department of Health and Human Services, Post Office Box 8206, Columbia, South Carolina 29202-8206. Any correspondence should include the control number appearing on Exhibit A of this report.

Thomas L. Wagner, Jr., CPA State Auditor

TLWjr/cwc

cc: Ms. Brenda L. Hyleman

Mr. Jeff Saxon Mr. Robert M. Kerr

MAGNOLIA MANOR - ROCK HILL, INC. ROCK HILL, SOUTH CAROLINA

CONTRACT PERIODS BEGINNING OCTOBER 1, 1998 AC# 3-MRH-J7

REPORT ON CONTRACT

FOR

PURCHASE OF NURSING CARE SERVICES

WITH

STATE OF SOUTH CAROLINA

DEPARTMENT OF HEALTH AND HUMAN SERVICES

CONTENTS

	EXHIBIT OR	
	SCHEDULE	<u>PAGE</u>
INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES		1
COMPUTATION OF RATE CHANGE FOR THE CONTRACT PERIODS BEGINNING OCTOBER 1, 1998	А	3
COMPUTATION OF ADJUSTED REIMBURSEMENT RATE FOR THE CONTRACT PERIOD OCTOBER 1, 1998 THROUGH NOVEMBER 30, 1998	B-1	4
COMPUTATION OF ADJUSTED REIMBURSEMENT RATE FOR THE CONTRACT PERIODS DECEMBER 1, 1998 THROUGH SEPTEMBER 30, 1999	B-2	5
SUMMARY OF COSTS AND TOTAL PATIENT DAYS FOR THE COST REPORT PERIOD ENDED SEPTEMBER 30, 1997	С	6
ADJUSTMENT REPORT	1	8
COST OF CAPITAL REIMBURSEMENT ANALYSIS	2	11
COMMENTS AND RECOMMENDATIONS		13

INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

October 19, 1999

Department of Health and Human Services State of South Carolina Columbia, South Carolina

We have performed the procedures described below, which were agreed to by the South Carolina Department of Health and Human Services, solely to compute the rate change and related adjusted reimbursement rate to be used by the Department in determining the reimbursement settlement with Magnolia Manor - Rock Hill, Inc., for the contract periods beginning October 1, 1998, and for the twelve month cost report period ended September 30, 1997, as set forth in the accompanying schedules. This engagement to apply agreed-upon procedures was performed in accordance with the standards established by the American Institute of Certified Public Accountants. The sufficiency of the procedures is solely the responsibility of the Department of Health and Human Services. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

- 1. We tested selected costs or areas based on our analytical procedures applied to the reimbursable Medicaid program costs as shown on the Financial and Statistical Report for Nursing Homes, as filed by Magnolia Manor Rock Hill, Inc., to determine if these costs were allowable as defined by the State Plan for Medicaid reimbursement purposes and supported by accounting and statistical records maintained by the provider. Our findings as a result of these procedures are presented in the Adjustment Report, Summary of Costs and Total Patient Days, Cost of Capital Reimbursement Analysis sections of this report, and the Comments and Recommendations section of this report.
- We recomputed the Computation of Reimbursement Rate using the adjusted costs and calculated the rate change in accordance with the provisions of the contract between the Department of Health and Human Services and Magnolia Manor Rock Hill, Inc. dated as of October 1, 1994 as amended. Our findings as a result of these procedures are presented in the Computation of Rate Change and Computations of Adjusted Reimbursement Rate sections of this report.

Department of Health and Human Services State of South Carolina October 19, 1999

We were not engaged to, and did not, perform an audit, the objective of which would be the expression of an opinion on the specified elements, accounts, or items. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the South Carolina Department of Health and Human Services and is not intended to be and should not be used by anyone other than the specified party.

Thomas L. Wagner, Jr., CPA State Auditor

Computation of Rate Change For the Contract Periods Beginning October 1, 1998 AC# 3-MRH-J7

	10/01/98- 11/30/98	12/01/98- 09/30/99
Interim reimbursement rate (1)	\$88.57	\$89.32
Adjusted reimbursement rate	83.47	84.22
Decrease in reimbursement rate	\$ <u>5.10</u>	\$ <u>5.10</u>

(1) Interim reimbursement rate from the South Carolina Medicaid Management Information System (MMIS) Provider Rate Listing dated December 3, 1999

Computation of Adjusted Reimbursement Rate
For the Contract Period October 1, 1998 Through November 30, 1998
AC# 3-MRH-J7

	Incentives	Allowable Cost	Cost Standard	Computed Rate
Costs Subject to Standards:				
General Services		\$41.03	\$48.65	
Dietary		8.06	9.44	
Laundry/Housekeeping/Maint.		6.86	7.70	
Subtotal	\$ <u>4.61</u>	55.95	65.79	\$55.95
Administration & Med. Rec.	\$ <u>3.83</u>	6.55	10.38	6.55
Subtotal		62.50	\$ <u>76.17</u>	62.50
Costs Not Subject to Standards:				
Utilities Special Services Medical Supplies & Oxygen Taxes and Insurance Legal Fees		2.00 1.89 3.32 1.47 .03		2.00 1.89 3.32 1.47 .03
TOTAL		\$ <u>71.21</u>		71.21
Inflation Factor (3.60%)				2.56
Cost of Capital				7.70
Cost of Capital Limitation				-
Profit Incentive (Max. 3.5% of A	Allowable Cost)			2.49
Cost Incentive				4.61
Effect of \$1.75 Cap on Cost/Prof	it Incentives			(5.35)
Minimum Wage Add-On				25
ADJUSTED REIMBURSEMENT RATE]			\$ <u>83.47</u>

Computation of Adjusted Reimbursement Rate
For the Contract Periods December 1, 1998 Through September 30, 1999
AC# 3-MRH-J7

	Incentives	Allowable Cost	Cost Standard	Computed Rate
Costs Subject to Standards:				
General Services		\$41.03	\$48.65	
Dietary		8.06	9.44	
Laundry/Housekeeping/Maint.		6.86	7.70	
Subtotal	\$ <u>4.61</u>	55.95	65.79	\$55.95
Administration & Med. Rec.	\$ <u>3.83</u>	6.55	10.38	6.55
Subtotal		62.50	\$ <u>76.17</u>	62.50
Costs Not Subject to Standards:				
Utilities Special Services Medical Supplies & Oxygen Taxes and Insurance Legal Fees		2.00 1.89 3.32 1.47 .03		2.00 1.89 3.32 1.47 .03
TOTAL		\$ <u>71.21</u>		71.21
Inflation Factor (3.60%)				2.56
Cost of Capital				7.70
Cost of Capital Limitation				-
Profit Incentive (Max. 3.5% of A	Allowable Cost)			2.49
Cost Incentive				4.61
Effect of \$1.75 Cap on Cost/Pro	fit Incentives			(5.35)
CNA Add-On				.75
Minimum Wage Add-On				. 25
ADJUSTED REIMBURSEMENT RATI	Ε			\$ <u>84.22</u>

MAGNOLIA MANOR - ROCK HILL, INC.
Summary of Costs and Total Patient Days
For the Cost Report Period Ended September 30, 1997
AC# 3-MRH-J7

Expenses	Totals (From Schedule SC 13) as Adjusted by DH&HS	Adjustm <u>Debit</u>	ents <u>Credit</u>	Adjusted Totals
General Services	\$1,652,750	\$ -	\$ 27,682 (3) 58,000 (5) 2,384 (5) 1,696 (6) 37 (8)	\$1,562,951
Dietary	312,764	-	5,743 (5) 105 (6)	306,916
Laundry	52,669	-	-	52,669
Housekeeping	144,698	-	-	144,698
Maintenance	65,675	-	300 (2) 1,225 (5) 257 (8)	63,893
Administration & Medical Records	307,342	-	18,961 (4) 5,247 (5) 928 (5) 14,217 (7) 18,362 (8)	249,627
Utilities	80,807	-	4,419 (3) 193 (8)	76,195
Special Services	81,545	2,718 (9)	2,774 (5) 9,350 (8)	72,139
Medical Supplies & Oxygen	138,450	245 (9)	8,378 (3) 3,939 (6)	126,378

MAGNOLIA MANOR - ROCK HILL, INC.
Summary of Costs and Total Patient Days
For the Cost Report Period Ended September 30, 1997
AC# 3-MRH-J7

	Totals (From Schedule SC 13) as	Adjustm	ents	Adjusted
Expenses	Adjusted by DH&HS	Debit	Credit	Totals
Taxes & Insurance	56,731	-	806 (8)	55,925
Legal Fees	1,386	-	62 (8)	1,324
Cost of Capital	299,117	4,409 (1)	3,142 (8) 6,874 (10)	293,510
Subtotal	3,193,934	7,372	195,081	3,006,225
Ancillary	57,147	-	-	57,147
Non-Allowable	64,519	300 (2) 40,479 (3) 18,961 (4) 76,301 (5) 5,740 (6) 14,217 (7) 32,209 (8) 6,874 (10)	2,963 (9)	256,637
Total Operating Expenses	\$ <u>3,315,600</u>	\$ <u>202,453</u>	\$ <u>198,044</u>	\$ <u>3,320,009</u>
TOTAL PATIENT DAYS	38,095			38,095
TOTAL BEDS	<u>106</u>			

Adjustment Report

Cost Report Period Ended September 30, 1997 AC# 3-MRH-J7

ADJUSTMENT <u>NUMBER</u>	ACCOUNT TITLE	DEBIT	CREDIT
1	Accumulated Depreciation Cost of Capital Other Equity Fixed Assets	\$ 16,388 4,409 20,903	\$ 41,700
	To adjust fixed assets and related depreciation to allowable HIM-15-1, Section 2304 State Plan, Attachment 4.19D		
2	Nonallowable Maintenance	300	300
	To properly charge expenses applicable to the prior period HIM-15-1, Section 2302.1		
3	Nonallowable Nursing Utilities Medical Supplies & Oxygen	40,479	27,682 4,419 8,378
	To disallow expenses not adequately documented and remove prior period expense HIM-15-1, Sections 2302.1 and 2304		
4	Nonallowable Administration	18,961	18,961
	To disallow administration-purchased services due to lack of documentation HIM-15-1, Section 2304		
5	Nonallowable Nursing Restorative Dietary Maintenance Administration Medical Records Therapy	76,301	58,000 2,384 5,743 1,225 5,247 928 2,774
	To adjust fringe benefits and related allocation to allowable HIM-15-1, Section 2304 State Plan, Attachment 4.19D		

Adjustment Report
Cost Report Period Ended September 30, 1997
AC# 3-MRH-J7

ADJUSTMENT NUMBER	ACCOUNT TITLE	DEBIT	CREDIT
6	Nonallowable Restorative Dietary Medical Supplies & Oxygen	5,740	1,696 105 3,939
	To disallow expenses not adequately documented HIM-15-1, Section 2304		
7	Nonallowable Administration	14,217	14,217
	To disallow undocumented interest expense HIM-15-1, Section 2304		
8	Nonallowable Nursing Maintenance Administration Utilities Taxes, Insurance & Licenses Therapy Legal Cost of Capital	32,209	37 257 18,362 193 806 9,350 62 3,142
	To disallow home office expenses not adequately documented HIM-15-1, Section 2304		
9	Medical Supplies & Oxygen Therapy Nonallowable	245 2,718	2,963
	To remove special (ancillary) services reimbursed by Medicare State Plan, Attachment 4.19D		
10	Nonallowable Cost of Capital	6,874	6,874
	To adjust capital return to allowable State Plan, Attachment 4.19D		

Adjustment Report
Cost Report Period Ended September 30, 1997
AC# 3-MRH-J7

ADJUSTMENT <u>NUMBER</u>	ACCOUNT TITLE	<u>DEBIT</u>	CREDIT
11	Memo Adjustment: To increase total square feet by 8,251 from 23,079 square feet to 31,330 square feet		
	TOTAL ADJUSTMENTS	\$ <u>239,744</u>	\$239,744

Due to the nature of compliance reporting, adjustment descriptions and references contained in the preceding Adjustment Report are provided for general guidance only and are not intended to be all-inclusive.

MAGNOLIA MANOR - ROCK HILL, INC.
Cost of Capital Reimbursement Analysis
For the Cost Report Period Ended September 30, 1997
AC# 3-MRH-J7

Original Asset Cost (Per Bed)	\$ 15,618
Inflation Adjustment	2.1814
Deemed Asset Value (Per Bed)	34,069
Number of Beds	106
Deemed Asset Value	3,611,314
Improvements Since 1981	456,323
Accumulated Depreciation at 9/30/97	(903,427)
Deemed Depreciated Value	3,164,210
Market Rate of Return	0.067
Total Annual Return	212,002
Return Applicable to Non-Reimbursable Cost Centers	-
Allocation of Interest to Non-Reimbursable Cost Centers	
Allowable Annual Return	212,002
Depreciation Expense	81,952
Amortization Expense	-
Capital Related Income Offsets	(444)
Allocation of Capital Expenses to Non-Reimbursable Cost Centers	
Allowable Cost of Capital Expense	293,510
Total Patient Days (Actual Days)	38,095
Cost of Capital Per Diem	\$

MAGNOLIA MANOR - ROCK HILL, INC.
Cost of Capital Reimbursement Analysis
For the Cost Report Period Ended September 30, 1997
AC# 3-MRH-J7

6/30/89 Cost of Capital and Return on Equity Capital Per Diem Reimbursement	\$ 6.53
Adjustment for Maximum Increase	3.99
Maximum Cost of Capital Per Diem	\$ <u>10.52</u>
Reimbursable Cost of Capital Per Diem	\$ 7.70
Cost of Capital Per Diem	7.70
Cost of Capital Per Diem Limitation	\$ <u> </u>

COMMENTS AND RECOMMENDATIONS

Our agreed-upon procedures identified a condition that we have determined to be subject to correction or improvement. We believe this condition should be brought to your attention.

The provider's accounting records did not adequately support expenses claimed. Many of the items requested were never made available. Some of the items include: payroll registers, the cash receipts journal, census records, audited worker's compensation premiums, support for working trial balance adjustments, invoices, general ledger journal entry support, and all records related to the home office expenses.

HIM-15-1, Section 2304 states:

"Cost information as developed by the provider must be current, accurate, and in sufficient detail to support payments made for services rendered to beneficiaries. This includes all ledgers, books, records, and original evidences of cost . . . which pertain to the determination of reasonable cost, capable of being audited."

By not maintaining sufficient documentation, to support cost claimed, the provider overstated expenses.

We recommend the provider maintain detailed records which sufficiently support expenses claimed and provide the Medicaid auditors access to <u>all</u> requested records in a timely fashion.